

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

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MAY 26 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

THE COMMENTS OF:

PR DOCKET 92-235

LOS ANGELES COUNTY TRANSPORTATION  
COMMUNICATIONS COOPERATIVE  
RE: Replacement of Part 90 by Part  
88 to Revise the Private Land  
Mobile Radio Services and Modify  
the Policies Governing Them

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To: The Commission

FCC MAIL BRANCH

COMMENTS OF THE LOS ANGELES COUNTY TRANSPORTATION  
COMMUNICATIONS COOPERATIVE (LACTCC)

The Los Angeles County Transportation Communications Cooper-

1 and economies of scale. They obtain technical expertise and  
2 services that they could not obtain on their own. For example,  
3 cooperatives can provide members with interchangeable radios,  
4 purchases in bulk, and centralized maintenance from technicians  
5 familiar with their equipment. All these benefits become much  
6 more difficult for individual users to achieve without a coopera-  
7 tive.

8 d. Cooperatives promote competition by contracting  
9 with suppliers of maintenance, radios and various systems, they  
10 equalize bargaining power between the consumers and suppliers of  
11 radio services.

12 2. The proposed new rules also have serious technical  
13 problems.

14 a. The 1996 date for channel splitting is far too  
15 early. The entire program should be delayed until 2004 or later.

1 d. The power reduction proposal will have an unfav-  
2 orable environmental impact, by requiring additional sites on  
3 mountain tops, and other ecologically sensitive areas.

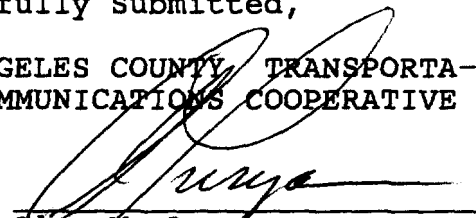
4 e. The consolidation of land mobile services will  
5 deprive providers of essential public services of the assurance  
6 that they will have frequencies when they need them.

7 Based on the foregoing, the LACTCC requests that the  
8 eligibility of cooperatives to hold licenses be preserved to the  
9 same extent as any other licensee, and that our technical objec-  
10 tions be addressed in any new rules.

11 Respectfully Submitted,

12 LOS ANGELES COUNTY, TRANSPORTA-  
13 TION COMMUNICATIONS COOPERATIVE

14 By:

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